

**DIVISION OF ENVIRONMENTAL HEALTH
SOLID WASTE PROGRAM
610 UNIVERSITY AVENUE
FAIRBANKS, ALASKA 99709-3643**
<http://www.state.ak.us/dec/home.htm>

**Telephone: (907) 451-2134
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File Number: 150.15.010

May 25, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED Z 182 375 085

The Honorable Richard Napoleone, Mayor
City of Anderson
P.O. Box 3100
Anderson, AK 99744

**Re: Solid Waste Disposal Permit #9931-BA007, Renewal of Anderson Sewage Sludge Monofill
Permit #9431-BA004**

Dear Mayor Napoleone:

The Department of Environmental Conservation has completed its evaluation of your application dated May 14, 1999, for the renewal of the solid waste disposal permit for the disposal of sewage solids in the Anderson Sewage Solids Monofill, located in Section 10 and 15, T.7S., R.8W., Fairbanks Meridian, and is issuing the enclosed permit in accordance with AS 46, 18 AAC 15, and 18 AAC 60. Please review the conditions and stipulations in the permit and ensure they are all understood. This permit is effective upon issuance and expires May 25, 2004.

Any person who disagrees with this decision may appeal the decision by requesting an adjudicatory hearing, using the procedures contained in 18 AAC 15.200-310. Hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Juneau, Alaska 99801-1728, within thirty (30) days of receipt of this letter. If a hearing is not requested within thirty (30) days, the right to appeal is waived. Also, please send a copy of the request to the undersigned.

The issuance of this permit does not release the applicant from the responsibility to adhere to other applicable permits, which may be required by other State and Federal Agencies.

Sincerely,

Kris McCumby for
Heather Stockard
Solid Waste Program Manager

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Enclosure: Permit 9931-BA007

cc: Mayor Gonzales, Denali Borough
Mayor Knight, City of Nenana

The Honorable Richard Napoleone

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May 25, 1999

bcc w/ enc: Heather Stockard

**ALASKA DEPARTMENT
OF
ENVIRONMENTAL CONSERVATION**

SOLID WASTE DISPOSAL PERMIT

Permit 9931-BA007

Date: May 25, 1999

This Solid Waste Disposal Permit is issued to the City of Anderson, P.O. Box 3100, Anderson, AK 99744, for the operation and maintenance of a sewage solids monofill at Anderson, AK in Sections 10 & 15, T.7S., R.8W., Fairbanks Meridian, approximately 1600 feet east of the Clear-Anderson Road. This permit is subject to the conditions and stipulations contained in Appendices A and B which are incorporated herein by reference.

The term "sewage solids" used in this permit refers only to wastewater treatment plant sludge or lagoon treated sludge that is at least 10 % solids by weight and is treated using the vector attraction reduction method described in 40 CFR 503.33(b)(11) (this means coverage with a minimum of six-inches of soil cover material upon placement in the disposal area). Or, the material must meet the Class A or B pathogen reduction requirements of 40 CFR Part 503.32 and the vector attraction reduction requirements of 40 CFR Part 503.33(b)(1) – (b)(10), which are adopted by reference in 18 AAC 60.505 before its disposal at the site. This permit does not allow for other types of industrial sludges to be landfilled at this site.

This permit is issued under provisions of Alaska Statute 46.03, the Alaska Administrative Code, as amended or revised, and other applicable state laws and regulations.

This permit is effective upon issuance and expires May 25, 2004. It may be terminated or modified in accordance with AS 46.03.120.

Kris McCumby for
Heather Stockard
Solid Waste Program Manager

May 25, 1999

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APPENDIX A - SPECIFIC CONDITIONS**I. SITE OPERATIONS:**

The permit holder shall:

- A. Comply with the designs and plans submitted with the application dated May 13, 1999, and the additional information submitted on May 18, 1999, as well as the following permit conditions. Additional modifications to the permit may be requested, but must be authorized by a permit amendment, before the modification is effective.
- B. Process and dispose of sewage sludge in accordance with the approved plans and specifications, and be responsible for sewage sludge disposal in the monofill. In the event the permittee employs an independent hauler or operator, the independent hauler or operator will be severally and jointly responsible for compliance with the sludge disposal requirements of this permit.
- C. Ensure that sewage sludge disposed of at this site meets the following requirements:
 - 1. It has been air-dried for a minimum of three months, two months of which must have average daily temperatures above 0° C. The sludge must be allowed to drain and dry on underdrained sand beds or basins, in which the sludge is no more than nine inches deep. Or, it has gone through at least one annual freeze/thaw cycle, and is subsequently air dried for at least one week during which there is minimal precipitation. This must occur on underdrained sand beds or basins and the layer of sludge present must be less than two-foot thick.
 - 2. It must be at least 10% solids on a dry weight basis before placement in the disposal cell.
 - 3. It is not hazardous waste as defined in 40 CFR Part 261 and its amendments.
 - 4. It does not contain polychlorinated biphenyls (PCB's) in concentrations greater than 10 PPM on a dry weight basis.
 - 5. It does not exceed the metals content limitations for Arsenic (73mg/kg), Chromium (600 mg/kg), and Nickel (420 mg/kg), on a dry-weight basis. These limits are based on the maintenance of a 500-foot separation distance between the sewage sludge disposal area and the property boundary.
- D. Ensure that a ten-foot separation distance between the base of the landfill and the seasonally high groundwater is maintained.
- E. Cover sewage sludge placed in the disposal area with a minimum of six inches of soil cover material at the end of each operating day. Cover materials shall be applied at more frequent intervals if necessary to control odors and disease vectors (e.g., flies). In the event that sewage sludge material must be placed in the disposal area in the winter months, contact the ADEC Solid Waste Program and a short-term plan for alternative cover material will be developed.

I. SITE OPERATIONS (cont.):

- F. Ensure that an intermediate soil cover of at least 12-inches in thickness is applied to the surface of the disposal areas where waste will not be accepted for 90 days or more. Intermediate cover must be placed over the waste disposal area within seven days after the waste is last

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deposited to an area. The intermediate cover needs to be graded to promote surface water drainage without surface water ponding or erosion of the cover material.

- G. Restrict public access to the monofill by erecting and maintaining fences and berms around the facility and a locked gate at the facility entrance.
- H. Maintain a readily visible sign at the entrance gate and one in the center of each side of the perimeter fence surrounding the facility with the following information printed in one-inch high or larger lettering:

Keep Out
Domestic Sludge Disposal Area
Owner/Operator Name
Emergency Telephone Number

- I. Ensure the sewage sludge disposal cells will not be developed within 200 feet of a private residence or private water supply well. The disposal cells shall not be developed within 100 feet from a surface water body, a major drainage channel, or wetland.
- J. Ensure disposal cells are not developed less than 500 feet from the property boundary unless analytical data of the sewage sludge show that the pollutant concentrations for arsenic, chromium, and nickel established in Table F of 18 AAC 60.470 will be met.
- K. Construct disposal cells such that they will not be inundated or suffer damage from flood waters. Sewage sludge shall not be placed in a disposal cell at the time that the site is experiencing a base flood event.
- L. Construct and maintain onsite roads as necessary to assure adequate traffic control. Adequate traffic control means that the site supervisor will maintain positive control of all persons who are within the monofill boundaries and that sewage sludge will be deposited in approved locations. Dumping in unauthorized areas violates conditions of this permit and Alaska Administrative Codes.
- M. Collect and dispose of all windblown and littered refuse from the disposal site and along the entrance road once each month. All littered wastes on lands within five hundred (500) feet of the site, whether windblown or dumped, shall be collected and disposed of at a frequency necessary to prevent litter from becoming an aesthetic nuisance.

II. SLUDGE TRANSPORT:

- A. In the event of any incident while transporting sewage sludge for disposal, ensure that:

- 1. It is reported to the ADEC Solid Waste Program (907)451-2108 within one hour of the spill.

II. SLUDGE TRANSPORT (cont.):

- 2. Clean up of spilled material is initiated within two hours after a spill occurs. The area where the spill occurred will be cleaned up and disinfected within 2-4 hours after the spill occurs.
 - 3. The area of the spill must be cleaned up to the satisfaction of the ADEC Solid Waste Program.

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4. Monitoring will be done at a spill site to assess potential environmental quality damages, if determined to be necessary by the ADEC Solid Waste Program.

III. PROHIBITIONS AND SPECIAL RESTRICTIONS

- A. Prohibit discharge of firearms at the facility.
- B. Prohibit the disposal of hazardous wastes as defined in 40 CFR part 261.3, oily wastes, waste oil, greases, paints, industrial sludges, and chemical wastes at this facility.
- C. Prohibit the disposal of wastes which contain more than 10 PPM of polychlorinated biphenyls (PCB's).
- D. Prohibit the disposal of any residential or commercial garbage (refuse) at this site.

IV. MONITORING AND REPORTING:

- A. Monitor the air for methane gas on a quarterly basis at the four monitoring points that are identified in Attachment I of the permit application. Retain the results of the monitoring activity in the operating record for the facility and make them available to ADEC personnel upon request or during facility inspections.
- B. Ensure the concentration of methane gas does not exceed the lower explosive limit for methane at the property line of the monofill or exceed 25% of the lower explosive limit within any structure in the monofill area.
- C. Analyze the sewage sludge in the drying beds for the total metals concentrations of arsenic, chromium, and nickel, on a dry-weight basis prior to its placement in the sewage sludge monofill disposal cell. This analysis shall occur at least once each year, unless the drying beds are cleaned out on a more frequent basis. Representative samples shall be collected and analyzed using the Quality Assurance/Quality control plan outlined in the permit application.
- D. Analyze the sewage sludge from the from the drying beds using the Toxicity Characteristic Leaching Procedure (TCLP) test to determine if the sewage sludge contains hazardous constituents once every five years. This test shall be done more frequently if there is a significant change in the commercial or industrial sources delivering septage to the lagoons for treatment.

IV. MONITORING AND REPORTING (cont.)

1. Analyze the current accumulation of sewage sludge in the drying bed for potential hazardous levels of contaminants using the TCLP test. Also test the sewage sludge samples for the presence of polychlorinated biphenyls (PCB's) using EPA method 8082. Testing shall be completed by September 1, 1999 and prior to the placement of sewage sludge in the disposal cell. Retain copies of the data in the facility's operating record.
2. Collect copies of analytical data from the City of Nenana showing that their sewage sludge has been tested using the TCLP test and does not fail any established pollutant limits for the test, prior to disposal in the monofill. Retain that test information in the City of Anderson's operating record for this facility.

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- E. Test the sewage sludge once every five years for the presence of polychlorinated biphenyls (PCB's) using EPA Method 8082. Retain that test data in the City of Anderson's operating record for the facility.
- F. Retain the sewage sludge analyses, visual and methane gas monitoring data in the facility operating record for at least five years and ensure that they are available for review, as needed, by the Department.
- G. Visually monitor the site on a monthly basis using the visual monitoring checklist form provided in the permit application. Note any problems observed at the time of the inspection and the corrective actions taken to resolve them. Retain copies of the visual inspections in the facility's operating record for review during inspections by the Department.
- H. Maintain a set of site development plans and update them on an annual basis. Retain copies of the site development plan in the facility's operating record for review during inspections by the Department.

V. SITE CLOSURE AND POST-CLOSURE REQUIREMENTS

- A. Notify the ADEC Solid Waste Program in writing at least 30 days in advance of the last scheduled placement of wastes in the monofill.
- B. Ensure that final cover, as described in the site Closure Plan in Section M of the permit application is placed over the site within 90 days after the last waste placement.
- C. Ensure the site Closure Plan as described in Section M of the permit application is followed. The Closure Plan may be modified prior to its implementation if a written request is received and written approval given by the ADEC Solid Waste Program.
- D. Prepare a survey as-built or updated facility record drawings showing the location and volume of waste deposited at the landfill within sixty (60) days of the final closure.

V. SITE CLOSURE AND POST-CLOSURE REQUIREMENTS (cont.):

- E. Record the survey as-built or updated facility record drawings at the State Recorder's Office (or other appropriate land records office approved by the Department) along with a plat note or other file notation informing future property owners that use of the land must not result in the disturbance of the integrity of the final cover, cap or other structures installed as part of the landfill closure, unless approved by the Department. Also, note that the land has been used as a sewage solids monofill. Submit a copy of the survey as-built or record drawings and proof of the recordings to the ADEC Solid Waste Program, Fairbanks Office within sixty (60) days of final closure.
- F. Visually monitor the site annually, for at least five (5) years immediately following closure, to check for signs of damage from settlement or erosion. The Department may extend the post-closure monitoring period if necessary, to ensure that the facility will not harm public health, safety, welfare, or the environment.
- G. Monitor the facility for methane gas once each quarter for five years immediately following closure. If the monitored levels exceed 25% of the lower explosive limit at any time, immediately notify the nearest ADEC Solid Waste Program office. If the levels are

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always lower than 25% of the methane gas lower explosive limit when monitored, submit the results of the methane monitoring data to the ADEC Solid Waste Program in the post-closure report required in item (H) below. The Department will require additional monitoring and corrective action as necessary, to meet the standards of 18 AAC 60.815 and 18 AAC 60.860.

- H. At the end of the post-closure period, submit a report to the nearest ADEC Solid Waste Program office describing site conditions and summarizing the information collected during post-closure monitoring.

APPENDIX B - GENERAL PERMIT CONDITIONS

I. ACCESS AND INSPECTION

The permittee shall allow the Commissioner or her/his representative access to the permitted facilities at reasonable times to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit, State laws, and regulations.

II. INFORMATION ACCESS

Except for information relating to confidential processes or methods of manufacture, all records and reports submitted in accordance with the terms of this permit shall be available for public inspection at the State of Alaska Department of Environmental Conservation, 610 University Avenue, Fairbanks, Alaska 99709-3643.

III. CIVIL AND CRIMINAL LIABILITY

Nothing in this permit shall relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, including, but not limited to, accidents, equipment breakdowns, or labor disputes.

IV. AVAILABILITY

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The permittee shall post or maintain a copy of this permit available to the public at the disposal facility.

V. ADVERSE IMPACT

The permittee shall take all necessary means to minimize any adverse impacts to the receiving waters or lands resulting from noncompliance with any limitation specified in this permit, including any additional monitoring needed to determine the nature and impact of the noncomplying activity. The permittee shall cleanup and restore all areas adversely impacted by the noncompliance.

VI. CULTURAL OR PALEONTOLOGICAL RESOURCES

Should cultural or paleontological resources be discovered as a result of this activity, work which would disturb such resources is to be stopped, and the State Historic Preservation Office, Division of Parks and Outdoor Recreation, Department of Natural Resources, is to be notified immediately (907-269-8721).

VII. APPLICATIONS FOR RENEWAL

In accordance with 18 AAC 15.100(d), applications for renewal or amendment of this permit must be made no later than thirty (30) days before the expiration date of the permit or the planned effective date of the amendment.

VIII. OTHER LEGAL OBLIGATIONS

The requirements, duties, and obligations set forth in this permit are in addition to any requirements, duties, or obligations contained in any permit that the Alaska Department of Environmental Conservation or the U.S. Environmental Protection Agency has issued or may issue to the permittee. This permit does not relieve the permittee from the duty to obtain any and all necessary permits and to comply with the requirements contained in any such permit or with applicable state and federal laws and regulations. All activities conducted by the permittee pursuant to the terms of this permit and all plans implemented by the permittee pursuant to the terms of this permit shall comply with all applicable state and federal laws and regulations.

IX. POLLUTION PREVENTION

In order to prevent and minimize present and future pollution, when making management decisions that affect waste generation, the permittee shall consider the following order of priority options: waste source reduction; recycling of waste; waste treatment; and waste disposal.